

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA,	)	
	)	
Appellant,	)	
	)	
v.	)	No. 24-4102
	)	
CONOR BRIAN FITZPATRICK,	)	
	)	
Defendant-Appellee.	)	

**Government's Unopposed Motion for an Extension  
of Time to File Its Opening Brief and the Joint Appendix**

The government's opening brief and the joint appendix in this matter are currently due on May 30, 2024. The government respectfully moves this Court for a 30-day extension, until June 29, 2024, to file its opening brief and the joint appendix. The government has consulted with defense counsel, who does not oppose this request.

The government has not previously sought an extension in this case. The government is proceeding diligently in preparing its opening brief and the joint appendix but believes that an extension is warranted. In recent weeks, the undersigned prepared the government's opening briefs and joint appendices in *United States v. Johnson*, No. 23-6896 (filed on April 19, 2024), and *United States v. Ray*, No. 24-4024 (filed on May 3, 2024). During the week of April 29 to May 3, the undersigned devoted significant time to participating in moots to assist her

colleagues preparing for oral arguments before this Court during the May sitting. Currently, the undersigned is drafting the government's response to the postconviction motion in *United States v. Richardson*, No. 3:00-cr-383 (E.D. Va. due on May 20, 2024), and the government's memorandum response brief in *United States v. Vane*, No. 24-4257 (due on May 24, 2024). The undersigned is also responsible for reviewing the government's response briefs in *United States v. Mattocks*, No. 23-4271 (due on May 31, 2024), *United States v. Rosales*, No. 23-4673 (due on June 5, 2024), and *United States v. Crawley*, No. 24-6257 (due on June 5, 2024).

Given this recent activity, as well as other obligations, an extension of the filing deadline would assist the government in preparing its opening brief in this matter. Therefore, the government requests a 30-day extension, until June 29, 2024, to file its opening brief and the joint appendix.

Respectfully submitted,

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By: \_\_\_\_\_/s/

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